



Department of the Interior - Indian Affairs
2013 Environmental Management Assessment and Performance Program

Division of Environmental and Cultural Resources Management
12220 Sunrise Valley Drive
Reston, Virginia 20191

Audit Start Date 7/9/2013 : Audit Completion Date 7/11/2013

**Environmental Management Assessment and Performance
Program(EMAP) Audit Summary Report**
Prepared for EPA

N35-07 Lukachukai Comm School (K-8) - GB
PO Box 230, Navajo Route 13 - Lukachukai, Arizona
86507





EPA Audit Report



N35-07 Lukachukai Comm School (K-8) - GB on 7/9/2013 - 7/11/2013 (EMAP (v 1)) by dmay

Hazardous Waste Management

Finding	Days NC
62. Failure to make a hazardous waste determination for unlabeled and outdated chemicals and other waste materials that has been generated. 40 CFR 262.11; 40 CFR 261.21 through 49 CFR 261.24. (RCRA) (CAFO)	Unknown
Recommended Corrective Actions	
Make a hazardous waste determination for unlabeled and outdated chemicals, and other waste being generated by identifying if the waste is either flammable, toxic, corrosive, or ignitable. Check the hazardous waste list in 40 FR 262, or if you have MSDS sheets, check the MSDS to see if it is a listed hazardous waste and look for the method of proper disposal. Maintain a copy of your determination in your EMS.	

Miscellaneous Maintenance Wastes

Finding	Days NC
10. Failure to inform employees on handling and operating procedures for universal waste - including emergency response procedures in case of a release. 40 CFR 273.16; or 40 CFR 273.36 (RCRA)	Unknown
Recommended Corrective Actions	
Provide clear instruction and training to employees who have responsibility for managing used batteries, lamps, pesticides and/o mercury containing thermostats. Include emergency response procedures / actions to be taken for releases from leaking containers or broken lamps. Document the instructions and employee training in the record location specified in the EMS.	

Solid Waste Management

Finding	Days NC
4. Failure to remove bulky waste at least once every three months. 40 CFR 243.203(1) (SWDA)	Unknown
Recommended Corrective Actions	
Remove bulky waste at least once every three months to inhibit the attraction of vectors and creation of nuisances. Includes materials that have been separated for the purpose of recycling.	

Spill Prevention Control and Countermeasure Planning

Finding	Days NC
30. Failure to prepare and implement a SPCC plan. 40 CFR 112.7 (SPCC)	Unknown
Recommended Corrective Actions	
Develop a SPCC plan if above ground containers of 55 gallons or greater exceed a total of 1,320 gallons; or underground storage capacity exceeds a total of 42,000 gallons; or if due to location, a facility could reasonably discharge oil/fuel/chemicals into wetlands or waterways.	

Toxic Substances Management

Finding	Days NC
13. Failure to designate a person responsible for asbestos oversight/management. 40 CFR 763.84(g)(1) (ASHERA)	Unknown
Recommended Corrective Actions	
Designate a person to ensure that requirements of 40 CFR 763.84(g)(1) are properly implemented. Train this employee to perform his/her duties. Document this designation in the Asbestos Management Plan. Maintain a copy of the Asbestos Management Plan in the EMS.	

Finding	Days NC
43. Failure to properly dispose of PCB waste within one year of becoming a waste. 40 CFR 761.65(a)(1) (TSCA)	Unknown
Recommended Corrective Actions	
Properly dispose of PCB waste within one year after becoming a waste by completing a waste manifest. Label waste PCBs with the start accumulation date.	



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Water Pollution

Finding	Days NC
4. Failure to prevent discharges of vehicle/bus washing from entering drainage ways and waters of the U.S. 40 CFR 122 (CWA)	Unknown
Recommended Corrective Actions	
Contain the washwater from vehicle/bus washing to prevent drainage/discharge into drainageways and waters of the U.S. If a sheen is visible on the washwater being contained, remove with a sorbent pad. If the facility can construct a wash bay with a oil/water separator, the washwater may be discharged into lagoon.	

Water Quality

Finding	Days NC
17. Failure to annually deliver a Consumer Confidence Water Report to each water consumer using the community water system. 40 CFR 141(o) (SDWA)	Unknown
Recommended Corrective Actions	
By July 1, provide an annual report to each water consumer which contains information concerning the quality of its water delivered by the system and characterizes the risks (if any) from exposure to contaminants detected in the water in an accurate and understandable manner.	

Finding	Days NC
44. Failure to operate a community water system by qualified personnel. 40 CFR 141.130(c) (CWA)	Unknown
Recommended Corrective Actions	
Obtain operator certification and maintain certification by meeting the requirements specified by the State and are included in a State register of qualified operators.	

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A copy of the information provided by IA to the Auditor regarding the date each building at the facility was constructed, if reasonably know is provided as an attachment